

EXHIBIT 30

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4

5 NATIONAL ASSOCIATION FOR THE
6 ADVANCEMENT OF COLORED PEOPLE,
7 Spring Valley Branch; JULIO CLERVEAUX;
8 CHEVON DOS REIS; ERIC GOODWIN; JOSE
9 VITELIO GREGORIO; DOROTHY MILLER;
10 HILLARY MOREAU; and WASHINGTON
11 SANCHEZ,
12

13 Plaintiffs,

14 vs.

15 EAST RAMAPO CENTRAL SCHOOL DISTRICT
16 and MARYELLEN ELIA, in her Capacity
17 As the Commissioner of Education
18 of the State of New York,
19

20 Defendants.

21 17 Civ. 8943
22 -----
23

24 VIDEOTAPED DEPOSITION OF YONAH ROTHMAN
25 Wednesday, November 14, 2018
New York, New York

26 REPORTED BY:

27 Christina Diaz, CRC, CRR, RMR, CSR, CLR

28 Job Number: 150986

1 Y. Rothman

2 plaintiffs.

3 MS. PARVIS: Elizabeth Parvis for
4 plaintiffs.

5 MR. CRAVENS: Will Cravens from
6 Morgan Lewis & Bockius for the defendant.

7 MR. BUTLER: David Butler for the
8 defendant.

9 THE VIDEOGRAPHER: Will the court
10 reporter please affirm the witness.

11 Y O N A H R O T H M A N,

12 having been duly affirmed by a
13 Notary Public, was examined and testified
14 as follows:

15 EXAMINATION

16 BY MR. JASON:

17 Q. Good morning, Mr. Rothman. I am
18 Kevin Jason. I work for the New York Civil
19 Liberties Union and I represent the plaintiffs
20 in this case.

21 Could you state your name for the
22 record.

23 A. Yonah Rothman.

24 Q. Okay. And you were just sworn in by
25 the court reporter. Do you understand that

1 Y. Rothman

2 Q. Fair. In the 2012 school board
3 elections, you ran on slate with Mr. Solomon
4 and Mr. Lefkowitz, correct?

5 MR. CRAVENS: Objection to form.

6 A. I am not sure, again, what slate
7 means, but I didn't know I was running with
8 them until I actually saw a sign on somebody's
9 lawn, so if that's slate, then, yes.

10 Q. So you saw a sign with your name
11 alongside Mr. Lefkowitz' name and
12 Mr. Solomon's name?

13 A. Right.

14 Q. And this was a sign encouraging
15 people to vote for the three of you?

16 A. Yes. I was only approached only
17 about my seat. It's funny. I should have
18 asked that question, but I never did. Maybe
19 it was silly of me, but I was just only really
20 concerned about my running for myself. So
21 when I saw the sign, I was like, oh, I should
22 have asked who else is running with me but...

23 Q. Do you know who made the decision to
24 create a sign for the three of you?

25 A. No.

1 Y. Rothman

2 for. No one -- I never went to a meeting who
3 to vote for. I relied on reading the
4 newspaper the week before. I was really -- I
5 am a big proponent of going out to vote. I
6 just always have been. So I make my wife
7 vote. I go out and my children, when they
8 turn 18, they go out and vote. And I believe
9 in the democratic process. I think that's how
10 you make change.

11 But there is no official group.
12 This WhatsApp group is probably as big as
13 anything that -- big that any kind of thing
14 that's set up out there. There is no like
15 mass e-mail, mail. You get some things in the
16 mail like from both sides, why they -- people
17 represent. You get that political mail like
18 you would get under any election, government,
19 senate, mayor election. And I think that can
20 be convincing. It's that people put a message
21 out. The other school wants to take away your
22 bussing. If the private school parent knows
23 all they get is bussing, and they are going to
24 take that away, and they are paying a lot in
25 taxes, they feel like, "I better vote for this

I N D E X

WITNESS

Yonah Rothman

EXAMINATION BY

Mr. Jason

PAGE

6

E X H I B I T S

(Exhibits attached to transcript)

ROTHMAN

DESCRIPTION

PAGE

Exhibit 1

Notice of Non-Party
Subpoena Duces Tecum,
two pages, with
attachments

32

Exhibit 2

Annual Budget & Trustee
Vote, Tuesday, May 15,
2012, Official Results,
one page

77

Exhibit 3

Expenditure and
Contribution Statement
for Candidates for
Member of the Board of
Education bearing
Production No. ERCSD
17737

92

Exhibit 4

Expenditure and
Contribution Statement
for Candidates for
Member of the Board
of Education bearing
Production No. ERCSD
17768

93

E X H I B I T S (Continued)

ROTHMAN	DESCRIPTION	PAGE
Exhibit 5	e-mail string beginning with e-mail dated 6/3/15 bearing Production No. ERSCD_ROTHMAN 307 through 308	106
Exhibit 6	Meeting Minutes dated July 2, 2013, pages 7295 through 7322	129
Exhibit 7	Article dated July 4, 2013, two pages	150
Exhibit 8	Letter dated July 7, 2013 bearing Production No. ERSCD_ROTHMAN 184	163
Exhibit 9	Meeting Minutes dated October 7, 2015, pages 7725 through 7727	168
Exhibit 10	e-mail string beginning with e-mail dated 3/7/2013 bearing Production Nos. ERSCD_ROTHMAN 406 through 407	175
Exhibit 11	Letter dated March 7, 2013, two pages	183
Exhibit 12	e-mail string beginning with e-mail dated 12/12/12 bearing Production No. ERSCD_ROTHMAN 389	189
Exhibit 13	e-mail dated 5/20/13 bearing Production No. ERSCD_ROTHMAN 238	195
Exhibit 14	e-mail string beginning with e-mail dated 5/20/13 bearing Production No. ERSCD_ROTHMAN 239	203

E X H I B I T S (Continued)

ROTHMAN	DESCRIPTION	PAGE
Exhibit 15	e-mail string beginning with e-mail dated 5/20/13 bearing Production Nos. ERSCD_ROTHMAN 245 through 246	210
Exhibit 16	e-mail string beginning with e-mail dated 5/20/13 bearing Production Nos. ERSCD_ROTHMAN 247 through 248	212
Exhibit 17	Letter dated December 17, 2015 bearing Production Nos. ERCSG_GROSSMAN 583 through 584	215
Exhibit 18	Article dated December 17, 2015, four pages	216
Exhibit 19	e-mail string beginning with e-mail dated 10/15/15 bearing Production Nos. ERCSG_GROSSMAN 838 through 840	227
Exhibit 20	e-mail dated 10/13/15 bearing Production No. ERCSG_GROSSMAN 841	229
Exhibit 21	WhatsApp Chat Transcript bearing Production No. ERCSG_BoA 75 through 76	244
Exhibit 22	ERCSA_BOE 75 Binders 1 and 2	244
Exhibit 23	WhatsApp Chat Transcript bearing Production Nos. ERCSG_BoA 500 through 502	248

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INFORMATION REQUESTS

INSERTED INFORMATION	- NONE -
REQUESTS FOR PRODUCTION	- NONE -
RULING	- NONE -
DIRECTIONS NOT TO ANSWER	- NONE -